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8 **UNITED STATES DISTRICT COURT**
9
10 **DISTRICT OF NEVADA**

11 VANESSA LIBRERA,

12 Plaintiff,

13 vs.

14 ALBERTSON'S, LLC d/b/a
15 ALBERTSON'S; ALBERTSON'S STORES
SUB LLC; ABS NV-O LLC; DOES 1
16 through 100 and ROE CORPORATIONS 1
through 100, inclusive,

17 Defendants.
18

Case No.: 2:18-cv-00873-JCM-CWH

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS'
MOTIONS IN LIMINE (SECOND
REQUEST)**

19 IT IS HEREBY STIPULATED by and between Plaintiff VANESSA LIBRERA
20 ("Plaintiff"), by and through her counsel of record, FARHAN R. NAQVI and ELIZABETH E.
21 COATS of NAQVI INJURY LAW, and Defendants ALBERTSON'S LLC d/b/a
22 ALBERTSON'S, ALBERTSON'S STORES SUB LLC and ABS NV-O LLC STATE FARM,
23 by and through their counsel of record, JACK P. BURDEN, ESQ. of BACKUS, CARRANZA &
24 BURDEN, that Plaintiff be granted an extension of time in which to file responsive pleadings to
25 Defendants' motions in limine filed on July 16, 2020, which include the following:
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- 27 1. *Defendants' Motion in Limine No. 1.: To Exclude Sedgwick Claims Management*
28 *Pre-Litigation Claims File* [ECF Doc. 47]



2. *Defendants' Motion in Limine No. 2: To Exclude Evidence of all Prior Incidents, Reports, Lawsuits or Claims* [ECF Doc. 48]
3. *Defendants' Motion in Limine No. 3: To Exclude Articles on Safety, Preventable Deaths, and Cart Corral Maintenance* [ECF Doc. 49]
4. *Defendants' Motion in Limine No. 4: To Exclude Any Testimony, Evidence or Questioning Regarding the Installation and Inspection of the Cart Corral* [ECF Doc. 50]
5. *Defendants' Motion in Limine No. 5: To Exclude Testimony, Evidence Regarding Unavailability of any Witnesses* [ECF Doc. 51]
6. *Defendants' Motion in Limine No. 6: To Exclude Plaintiff from Presenting Arguments Based Upon Reptilian Theory, the Golden Rule or Safety Rules* [ECF Doc. 52]

The parties stipulate that the deadline for Plaintiff's responsive pleadings to the aforementioned motions be up to and including **August 24, 2020**. The current deadline for Plaintiff's oppositions is August 14, 2020 per the Court's July 27, 2020 Order [ECF Doc. 56]. Good cause exists for this extension as the parties are currently discussing potential resolution of this matter. Therefore, this extension will help to facilitate the parties' attempt at resolving this matter by preserving the unnecessary expenditure of costs and resources. Moreover, as the trial in this matter is not until January 25, 2021, there is sufficient time to allow the extension and hear the pending motions prior to trial in the event a settlement is not reached.

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1 This is the second stipulation for extension of time to file Plaintiff's responsive pleadings
2 to the subject motions.

3 DATED this 12th day of August, 2020.

DATED this 12th day of August, 2020.

4 NAQVI INJURY LAW

BACKUS, CARRAZNA & BURDEN

5 /s/ Elizabeth E. Coats

/s/ Jack P. Burden

6 FARHAN R. NAQVI

JACK P. BURDEN, ESQ.

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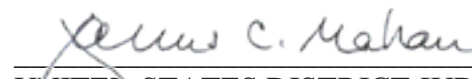
9500 W. Flamingo Rd., Suite 104

Counsel for Defendants

Las Vegas, Nevada 89147

Counsel for Plaintiff

10 **IT IS SO ORDERED:**

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12 _____
13 UNITED STATES DISTRICT JUDGE

14 DATED: August 12, 2020

